UNITED STATES OF AMERICA) Criminal No. 5:17-CR-30 (FTS)
v.)) Indictment
VINCE HOWINGTON,) Violations: 18 U.S.C. § 371; 8 U.S.C. § 1325(c) [Conspiracy to Commit Marriage Fraud]) 8 U.S.C. § 1325(c)[Marriage Fraud]) Fraud]
) 2 Counts
Defendant.) County of Offense: Onondaga

THE GRAND JURY CHARGES:

COUNT 1 [Conspiracy to Commit Marriage Fraud]

On or about February 22, 2012, in Onondaga County in the Northern District of New York, the defendant, VINCE HOWINGTON, who was a citizen of the United States, conspired with a woman whose identity is known to the grand jury with the initials "N.E.", who was a citizen of Israel and an alien in the United States, to commit marriage fraud by knowingly entering into a marriage for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 8, United States Code, Section 1325(c) and Title 18, United States Code, Section 371.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the conspirators committed the following overt acts, among others, in the Northern District of New York and elsewhere:

- (1) In or around 2011, "N.E." offered to pay **VINCE HOWINGTON** \$10,000 to marry her so that she could obtain United States citizenship;
- (2) On or about February 22, 2012, **VINCE HOWINGTON** participated in a fraudulent marriage ceremony with "N.E." for the purpose of obtaining her citizenship;
- (3) On or about February 23, 2012, after the marriage ceremony, N.E. paid VINCE HOWINGTON \$1,000 for marrying her.
- (4) Thereafter, "N.E." paid **VINCE HOWINGTON** \$333 a month for the fraudulent marriage.

In violation of Title 18, United States Code, Section 371.

COUNT 2 [Marriage Fraud]

On or about February 22, 2012, in Onondaga County in the Northern District of New York, the defendant, **VINCE HOWINGTON**, who was a citizen of the United States, did knowingly and unlawfully enter into a marriage with a woman whose identity is known to the grand jury with the initials "N.E.", who was a citizen of Israel and an alien in the United States, for the purpose of evading a provision of the immigration laws of the United States, in violation of Title 8, United States Code, Section 1325(c).

Dated: February 16, 2017

A TRUE BILL,

*Name Redacted

Grand ury Foreperson

RICHARD S. HARTUNIAN United States Attorney

By: Lanou Bothomor

Tamara B. Thomson

Assistant United States Attorney Bar Roll No. 515310